EXHIBIT I

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MDL NO. 2492

IN RE: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT-ATHLETE CONCUSSION LITIGATION Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

DECLARATION OF URSULA KUNHARDT

- I, Ursula Kunhardt, under oath, declare as follows:
- 1. I am a former student-athlete and played volleyball at Montana State University in Bozeman, Montana from 2011 to 2012. I played outside hitter for the volleyball team until suffering a concussion in practice which forced me to quit the team. I am not related to any of the lawyers currently representing the parties in this matter. I have not been promised any compensation for my participation in this matter. I have full knowledge of the matters stated herein and could and would testify hereto if necessary.
- 2. I received and reviewed the Amended Settlement Agreement in this matter. I was asked to review the Settlement Agreement on behalf of current NCAA student-athletes who have played non-contact sports to determine if the Settlement is fair, adequate and reasonable as it applies to student-athletes who play non-contact sports.
- 3. I can attest from personal experience that concussions can and do occur in sports other than traditional "contact sports" such as volleyball. When concussions do occur in these sports, they can be just as devastating and have just as much of an effect on a student-athlete's

health regardless of whether the student-athlete plays football or volleyball. Therefore, the Settlement should cover players in all sports.

- 4. During my career, I hit my head on the floor during a drill in practice and sustained a concussion. Despite remaining symptomatic, I was rushed back to play by the training staff even though I did not feel ready to return to play. I was not subject to medical screening and did not see a physician until I requested a neuropsychological evaluation well after my injured occurred. For my own safety, I decided to quit the team rather than participate in the same drills that caused my concussion. My performance in certain classes also suffered as a result of the concussion.
- 5. Accordingly, I believe that all former student-athletes should have access to the Medical Monitoring Program regardless of the sport they played. The ability to obtain access to the diagnostic program provided under the Settlement is a valuable benefit for former student-athletes.
- 6. I understand that it is not practical for medical personnel to be present at all non-contact sports games. However, it gives me comfort knowing that if a concussion occurs at a non-contact sports event, that the Settlement requires that a student-athlete obtain medical clearance prior to returning to play regardless of sport and mandates that student-athletes, coaches, and athletic trainers receive concussion education before each season.
- 7. The mandatory education of student-athletes, coaches, and athletic trainers is particularly important. Following my injury, I was rushed back to play by the school's athletic trainers despite expressing to them that I was still struggling with symptoms relating to my concussion. Requiring that athletic trainers receive the proper training will benefit student-

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athletes that participate in non-contact sports and decrease the likelihood that they are returned to play too soon.

- 8. In addition, it is also extremely important that the Settlement requires that all student-athletes, regardless of sport, obtain medical clearance prior to returning to play. I was not seen by a physician until I requested that I see one and am convinced my symptoms could have been alleviated if I had promptly been evaluated by a physician and withheld from play until I fully recovered.
- 9. Finally, the requirement that the NCAA provide education for faculty regarding academic accommodations for student-athletes suffering from concussions is also very important. Following my injury, it was extremely difficult to focus and study which caused me to struggle with classes and school work.
- 10. Based on my personal experiences and struggles with concussions in volleyball, I think the Settlement is important because it covers all sports rather than just football. I want to be a class representative to prevent my situation from happening to other student-athletes. I think that the Settlement will ensure that student-athletes are handled with the proper concussion management procedures and also will provide medical screening for athletes who are struggling because of concussion symptoms because many people may not know why they are struggling.

Date: December 13, 2014

Ursula Kunhardt